

**IN THE UNITED STATE DISTRICT COURT FOR
THE DISTRICT OF NEW JERSEY**

In re:

NATIONAL REALTY INVESTMENT
ADVISORS, LLC,
Debtor.

Chapter 11

Case No. 22-14539 (JKS)

AIRN LIQUIDATION TRUST CO., LLC,
Appellant,

Case No. 2:24-cv-10144-CCC

Honorable Claire C. Cecchi

v.

MEDIA EFFECTIVE, LLC,
Appellee.

**NOTICE OF MOTION FOR AN ORDER
ADMITTING ANECA E. LASLEY TO APPEAR *PRO HAC VICE***

TO: PARTIES ON THE COURT’S ELECTRONIC MAIL NOTICE LIST

PLEASE TAKE NOTICE that on _____ 2024, at _____ a.m.,
AIRN Liquidation Trust Co., LLC, in its capacity as the Liquidation Trustee of the AIRN Liquidation Trust (the “Appellant” or the “Liquidation Trustee”), appointed pursuant to the First Amended Joint Chapter 11 Plan of Liquidation of National Realty Investment Advisors, LLC and its Affiliated Debtors (as amended and supplemented, the “Plan”) [Case No. 22-14539, Docket No. 3256] shall apply, pursuant Local Civil Rule 101.1(c), before the Honorable Judge Claire C. Cecchi, United States District Court for the District of New Jersey, at the Martin Luther King Building & U.S. Courthouse 50 Walnut Street, Newark, NJ 07101, for entry of an Order admitting Aneca E. Lasley, Esq., of the law firm Ice Miller LLP, counsel for Appellant in this proceeding, *Pro Hac Vice* on behalf of Appellant in the pending matter.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Appellant will rely upon the declaration of Louis T. DeLucia submitted herewith.

PLEASE TAKE FURTHER NOTICE that Appellant does not request the opportunity to present oral argument in support of this Motion.

PLEASE TAKE FURTHER NOTICE that a proposed order granting the relief requested is submitted herewith.

Dated: December 5, 2024

ICE MILLER LLP

/s/ Louis T. DeLucia

Louis T. DeLucia

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*Counsel to Plaintiff/Appellant AIRN Liquidation
Trust Co., LLC, in its capacity as Liquidation
Trustee of the AIRN Liquidation Trust*

**IN THE UNITED STATE DISTRICT COURT FOR
THE DISTRICT OF NEW JERSEY**

In re:

NATIONAL REALTY INVESTMENT
ADVISORS, LLC,
Debtor.

Chapter 11

Case No. 22-14539 (JKS)

AIRN LIQUIDATION TRUST CO., LLC,
Appellant,

Case No. 2:24-cv-10144-CCC

Honorable Claire C. Cecchi

v.

MEDIA EFFECTIVE, LLC,
Appellee.

**DECLARATION OF ANECA E. LASLEY IN SUPPORT OF MOTION
FOR AN ORDER ADMITTING ANECA E. LASLEY TO APPEAR *PRO HAC VICE***

I, Aneca E. Lasley, of full age, hereby certify as follows:

1. I am a partner with the law firm of Ice Miller LLP, 250 West Street, Suite 700, Columbus, OH 43215-7509.
2. I make this Declaration in connection with my Motion to be admitted *pro hac vice* in the above captioned civil case to represent AIRN Liquidation Trust Co., LLC, in its capacity as the Liquidation Trustee of the AIRN Liquidation Trust (the “Appellant” or the “Liquidation Trustee”), appointed pursuant to the First Amended Joint Chapter 11 Plan of Liquidation of National Realty Investment Advisors, LLC and its Affiliated Debtors (as amended and supplemented, the “Plan”) [Case No. 22-14539, Docket No. 3256].

3. I am a member in good standing of the bar of Ohio State Court and have been since 2000. The roll of attorneys for Ohio State Court is maintained at 65 South Front Street, Columbus, Ohio 43215.

4. I am a member in good standing of the bar of the United States District Court for the Southern District of Ohio since 2003. The roll of attorneys for the United States District Court for the Southern District of Ohio is maintained at Robert C. Byrd U.S. Courthouse, 100 East 5th Street, Room 103, Cincinnati, OH 45202.

5. I am a member in good standing of the bar of the United States District Court for the Northern District of Ohio since 2009. The roll of attorneys for the United States District Court for the Northern District of Ohio is maintained at 201 Superior Avenue, Cleveland, OH 44114.

6. I am a member in good standing of the bar of the United States District Court for the District of Colorado since 2007. The roll of attorneys for the United States District Court for the District of Colorado is maintained at 901 19th Street, Denver, CO 80294-3589.

7. I am a member in good standing of the bar of the United States Court of Appeals for the Third Circuit and have been since 2020. The roll of attorneys for the United States Court of Appeals for the Third Circuit is maintained at 601 Market Street, Philadelphia, Pennsylvania 19106.

8. I am a member in good standing of the bar of the United States Court of Appeals for the Sixth Circuit and have been since 2011. The roll of attorneys for the United States Court of Appeals for the Sixth Circuit is maintained at 100 East Fifth Street, Cincinnati, Ohio 45202.

9. I am a member in good standing of the bar of the United States Supreme Court and have been since 2009. The roll of attorneys for the United States Supreme Court is maintained at 1 First Street, NE, Washington, D.C. 20543.

10. I am not under suspension or disbarment by any court.

11. I have no disciplinary proceeding pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

12. I have been advised of my obligation to make payments of an annual fee to the New Jersey Lawyers' Fund For Client Protection in accordance with New Jersey Court Rule 1:28-2, and have already satisfied that payment for 2024 in connection with my admission *pro hac vice* before the U.S. Bankruptcy Court for the District of New Jersey in the related bankruptcy case, *In re: National Realty Investment Advisors, LLC*, Case No. 22-14539 (JKS).

13. I have familiarized myself with the Local Rules promulgated by this Court and will at all times conduct myself in accordance with such Rules during the conduct of this case.

14. I understand that if I am admitted *pro hac vice* to this Court, I am within its disciplinary jurisdiction, and I voluntarily consent to the same and certify that I will abide with all rules, regulations and orders of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 5, 2024

/s/ Aneca E. Lasley
Aneca E. Lasley

**IN THE UNITED STATE DISTRICT COURT FOR
THE DISTRICT OF NEW JERSEY**

In re: NATIONAL REALTY INVESTMENT ADVISORS, LLC, Debtor.	Chapter 11 Case No. 22-14539 (JKS)
AIRN LIQUIDATION TRUST CO., LLC, Appellant, v. MEDIA EFFECTIVE, LLC, Appellee.	Case No. 2:24-cv-10144-CCC Honorable Claire C. Cecchi

**DECLARATION OF LOUIS T. DELUCIA IN SUPPORT OF MOTION
FOR AN ORDER ADMITTING ANECA E. LASLEY TO APPEAR *PRO HAC VICE***

I, Louis T. DeLucia, of full age, hereby certify as follows:

1. I am a partner with the law firm of Ice Miller LLP, 1500 Broadway, Suite 2900, New York, New York 10036.
2. I have been a member in good standing of the bar of the State of New Jersey since 1986 and a member in good standing of the bar of the United States District Court for the District of New Jersey since 1986.
3. I make this Declaration in support of the application of Aneca E. Lasley to practice before this court *pro hac vice* in accordance with L. Civ. R. 101.1(c). The facts contained in the Declaration of Aneca E. Lasley are true and correct to the best of my knowledge, information, and belief.

4. I am counsel of record in this matter and will work closely with Ms. Lasley. As counsel of record, I understand that in the event that the Court grants this application, all notices, orders and pleadings shall be served upon me as local counsel, and I shall notify counsel of their receipt, and that only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees, or orders. I further understand that I will be held responsible for Ms. Lasley and the conduct of this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: December 5, 2024

/s/ Louis T. DeLucia
Louis T. DeLucia